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**From:** Brasaemle, Karla [Karla.Brasaemle@TechLawInc.com]  
**Sent:** 1/31/2018 11:11:24 PM  
**To:** Chesnutt, John [Chesnutt.John@epa.gov]  
**CC:** LEE, LILY [LEE.LILY@EPA.GOV]  
**Subject:** FW: EPA final review of draft Radiological Data Evaluation Findings Report for Parcels B & G  
**Attachments:** EPA comments on draft Rad Data Eval Parcels B G Text 12-29-2019.pdf; Parcel B Rad Data Eval EPA DTSC CDPH Reviews final.xlsx; Parcel G Rad Data Eval EPA DTSC CDPH Review 12-29-2017 final.xlsx

Hi John,

At Lily's request here are the comments and letter she sent on 12/29/17.

Karla Brasaemle, P.G.,  
TechLaw, Inc.  
415-762-0566

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**From:** LEE, LILY [mailto:LEE.LILY@EPA.GOV]  
**Sent:** Friday, December 29, 2017 2:19 PM  
**To:** Brooks, George P CIV <george.brooks@navy.mil>  
**Cc:** Robinson, Derek J CIV NAVFAC HQ, BRAC PMO <derek.j.robinson1@navy.mil>; thomas.macchiarella@navy.mil; Edwards, Zachary L CIV SEA 04 04N <zachary.edwards@navy.mil>; Slack, Matthew L CIV SEA 04 04N <matthew.slack@navy.mil>; Henderson, Kim/SDO <Kimberly.Henderson@CH2M.com>; Hay Scott <shay@cabreraservices.com>; kira.sykes@ch2m.com; juanita.bacey@dtsc.ca.gov; Singh, Sheetal (CDPH-EMB) <sheetal.singh@cdph.ca.gov>; Jue, Tracy (CDPH-EMB) <tracy.jue@cdph.ca.gov>; Amy Brownell (amy.brownell@sfdph.org) <amy.brownell@sfdph.org>; Bob Burns <reburns@ngtsinc.com> (reburns@ngtsinc.com) <reburns@ngtsinc.com>; Christina Rain <crain@langan.com>; Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>; Kappelman, David <Kappelman.David@epa.gov>; Dawson, Jana <Jana.Dawson@TechLawInc.com>; donna.j.getty <donna.j.getty@leidos.com>; Chesnutt, John <Chesnutt.John@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>; Janda, Danielle L CIV <danielle.janda@navy.mil>; kathryn.higley@oregonstate.edu  
**Subject:** EPA final review of draft Radiological Data Evaluation Findings Report for Parcels B & G

Dear Pat,

Thank you for providing for review the *Draft Radiological Data Evaluation Findings Report for Parcels B and G Soil* ("Report"), Former Hunter's Point Naval Shipyard (HPNS), September 2017. In response to the Navy's request for EPA to expedite its responses, I previously provided draft interim comments on October 13, October 20, and October 27 at various milestones during the review process. Attached please find EPA's final comments that pull all of these together into one package. The final version does not change any overall conclusions regarding individual trench unit form review already submitted or about Parcels B or G overall. It also does not change any of the narrative comments previously provided on the text portion of the draft Report. Here is a list of updates and additions to the previously submissions:

1. **Cover Letter** – Added a cover letter that summarizes highlights of findings from the review.
2. **Narrative comments** - Added comments regarding the conceptual site model and other material in the text narrative. The previous General Comments were numbered 1 through 20. The additional General Comments start at #21 to continue where we left off. The one additional Specific Comment is similarly numbered #12 to continue where we left off there. I also added an Introduction/Background

section at the beginning to provide context to any reader who may have less detailed prior knowledge of the circumstances of the review.

3. **Parcel B Trench Unit Reviews** - Added comments and conclusions for remaining one-third of Parcel B trench unit forms not already provided October 27.
4. **Parcel B Fill Unit reviews** - Added recommendations to resample additional Parcel B fill units because they received soil from trench unit sources that are newly recommended for resampling. Ten fill units remained that did not receive soil from suspect trench units. The new comments add review of those and findings of evidence of potential signs of falsification or failure to follow the workplan, which could cause data quality concerns.
5. **Excel workbooks overall** - Combined spreadsheets previously sent from different agencies at different times, for the reader's convenience. Added a Table of Contents, titles, and notes to help the reader follow the content. Added tables that provide summary information across all of Parcel B and all of Parcel G. Updated the Parcel G spreadsheet to make minor corrections and make formats more consistent. These updates did not change substantive overall conclusions.
6. **Statistical Analyses** - Added clarifying notes to the supplemental statistical analyses already sent previously to help the reader follow the content.

Please contact me or my supervisor John Chesnutt (415-972-3005, [chesnutt.john@epa.gov](mailto:chesnutt.john@epa.gov)) with any concerns or questions.

Thanks.

Lily